

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR MOVANT)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Deborah L. Hunter Debtor(s) ----- Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI Creditor/Movant v. Deborah L. Hunter Debtor(s)	Chapter: 13 Bankruptcy Case: 18-11079-elf Judge: FRANK, ERIC L.
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ORDER APPROVING STIPULATION/CONSENT ORDER

AND NOW, this _____ day of _____, 2019, upon consideration of the
Stipulation between Debtor and Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI, it is
hereby ORDERED and DECREED that the Stipulation is APPROVED and made an Order of the Court.

BY THE COURT:

UNITED STATES BANKRUPTCY JUDGE

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In Re: Deborah L. Hunter Debtor(s)	Chapter: 13 Bankruptcy Case: 18-11079-elf Judge: FRANK, ERIC L.
----- Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI Creditor/Movant v. Deborah L. Hunter Debtor(s)	

**CONSENT ORDER/STIPULATION
 SETTLING MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, this _____ day of _____, 2019, upon the Motion of Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI, through its Counsel, Stern & Eisenberg PC, under 11 U.S.C. § 362(d) (and § 1301) for relief from the automatic stay as to Debtor's real property located at **1817 Ashurst Road, Philadelphia, PA 19151** (hereinafter, the "Property"), and the parties agreeing to the entry of the Order settling the Motion for Relief and for cause shown, it is hereby ORDERED AND DECREED as follows:

1. As of October 16, 2019, Deborah L. Hunter (hereinafter, "Debtor") acknowledges that Debtor is due for the following post-petition regular monthly payments from May 25, 2019 as follows:

PAYMENTS: \$2,731.68

06/25/2019	08/25/2019	\$549.36	@ 3 MONTHS	\$1,648.08
09/25/2019	10/25/2019	\$541.80	@ 2 MONTHS	\$1,083.60

SUSPENSE (\$505.22)

POST-PETITION ARREARS ("ARREARS") \$2,226.46

2. Debtor shall cure the Arrears as set forth above by paying one-fifth (1/5) of the Arrears per month (\$371.08/month) for the next five months together with the regular monthly mortgage payment (currently \$541.80/month) for a total monthly payment of **\$912.88 monthly** for the next five months beginning in **November 25, 2019**. Debtor shall pay a final payment of **\$371.06** for the final month together with the regular monthly mortgage payment (currently \$541.80/month) for a total monthly payment of **\$912.86**. In the event the regular monthly payment changes for any reason, then the amount due pursuant to this

paragraph 2 shall be adjusted accordingly. Thereafter, Debtor agrees to continue making the regular monthly mortgage payment.

3. Payment(s) due in accordance with this Consent Order/Stipulation shall be due on or before the 25TH of each month.

4. Debtor shall make the regular monthly payments required to the Trustee.

5. All payments due to Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI from Debtor are to be made directly to Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI at Attn Remittance Processing PO Box 65450, Salt Lake City, UT 84165, making sure that Creditor's loan number appears on all payments.

6. In the event Debtor fails to make any of the payments set forth hereinabove (or payments for real estate taxes and/or hazard insurance when due) on or before their due dates, Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI and/or Counsel may give Debtor and Debtor's counsel notice of the default.

7. If any such default is not cured within ten (10) days of said notice of the default, upon certification to the court of such default, and request for Order, with a copy to Debtor and Debtor's counsel, Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI shall immediately have relief from the bankruptcy stay, per the form of the attached Order which is made part hereof as Exhibit "A".

8. Debtor shall pay \$75.00 for each Notice of Default issued by Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI as a result of Debtor's failure to make payments in accordance with this Order.

9. The failure by Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI, at any time, to file a Certification of Default upon default by Debtor shall not be construed, nor shall such failure act, as a waiver of any of Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI's rights hereunder.

10. Upon issuance of the aforesaid Order, the parties hereto further agree that Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI (and any assignee/successor-in-interest) may proceed in state court to exercise all rights and remedies available to it as a mortgagee and creditor under state and federal law including, but not limited to, the initiation of and continuation of foreclosure and execution process through sheriff's sale concerning the Property and ejectment thereafter.

11. In the event Debtor converts to a bankruptcy under Chapter 7 of the Bankruptcy Code, Debtor shall pay all pre-petition arrears and post-petition arrears within ten (10) days from the date that the case is converted. If Debtor fails to make payment in accordance with this paragraph then Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI, through Counsel, may file a certification setting forth said failure and Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI shall be granted immediate relief from the automatic stay in the form of Order attached as Exhibit "A".

12. It is further agreed that the 14-day stay provided by Rule 4001(a)(3) is hereby waived. In the event an order granting relief is entered then the requirements of 3002.1 shall NOT apply to Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI.

13. Facsimile signatures shall be as valid as original signatures and this Consent Order/Stipulation may be signed in counterparts.

By signing this Stipulation/Consent Order, Debtor's Counsel represents that Debtor is familiar with and understand the terms of the Stipulation/Consent Order and agree to said terms regardless of whether Debtor has actually signed said stipulation. Seen and agreed by the parties on the date set forth below:

/s/Daniel P. Jones, Esq.

Daniel P. Jones, Esq.
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111
djones@sterneisenberg.com
Counsel for Creditor
Date: November 12, 2019


Robert D. Steinberg, Esq.

1845 Walnut Street
24th Floor
Philadelphia, PA 19103
(215) 814-9200
Fax: 215-567-2310
Email: rsteinberg@wwdlaw.com
Counsel for Debtor(s)
Date:


William C. Miller, Esq.

Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105
215-627-1377
elf@ph13trustee.com
Date:

NO OBJECTION

*without prejudice to any
trustee rights and remedies.

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(COUNSEL FOR MOVANT)

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**ORDER GRANTING RELIEF FROM AUTOMATIC STAY AND RELIEF FOLLOWING
CERTIFICATION OF DEFAULT OF CONSENT ORDER/STIPULATION**

AND NOW, this _____ day of _____, 2019, upon Motion of Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI (Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI) for relief and a Certification of Default having been filed in accordance with the Consent Order/Stipulation Resolving the Motion, it is hereby ORDERED AND DECREED that Movant, Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI ("Select Portfolio Servicing, Inc as servicing agent for ABS REO Trust VI") (and any assignee/successor-in-interest) is granted relief from the stay of 11 U.S.C. §362 (and § 1301) to proceed with its mortgage foreclosure action and Sheriff's Sale (and all other rights under state and federal law) concerning the Property: **1817 Ashurst Road, Philadelphia, PA 19151**.

It is ORDERED and DECREED that the 14-day stay pursuant to BKRP 4001(a)(3) is hereby waived and the requirements of Rule 3002.1 shall not apply to Movant.

BY THE COURT

UNITED STATES BANKRUPTCY JUDGE